

November 21, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

We are rural telecommunications carriers that elected the revised offer of Alternative Connect America Model (A-CAM) support in Tennessee. We urge the Federal Communications Commission (“Commission”) to take action before the end of this year to authorize additional A-CAM funding up to \$200/month per eligible customer location to enable more rural consumers in Tennessee to have the broadband connectivity necessary for jobs, education, healthcare, and economic development.

The time to act is now. The mechanism to distribute additional funds to advance broadband deployment is already in place. The additional funding will be targeted to high-cost census blocks that are not served by unsubsidized competitors where, absent support, it is not economically feasible to extend broadband service. We are already upgrading network infrastructure in our communities and are eager to further extend the reach of those networks to additional customers. If we receive additional funding now, we will be able to design our network upgrades in the most efficient manner to better serve our communities.

This additional funding will result in defined and measurable progress in closing the digital divide. The companies in Tennessee that elected the revised offer of A-CAM support in January 2017 committed at that time to deploy broadband to a specific number of additional locations if further funding were made available by December 31, 2017. We are ready, willing and able to meet those additional broadband deployment obligations. Collectively, additional funding of \$200/month per location would result in an additional 1,138 locations in Tennessee having access to a minimum of 25/3 Mbps broadband service, while an additional 2,326 locations would have access to service of at least 10/1 Mbps. The number of A-CAM funded locations that would remain on “reasonable request” in Tennessee would decrease by 94 percent if funding is increased to this level – meaning that the carriers serving these customers will have a concrete obligation to deploy broadband to them.

Allocating this additional funding to further extend broadband in our communities will result in more far reaching economic and social benefits. Access to broadband is critical to economic growth and productivity in rural areas, which will benefit the entire nation. Further extending the reach of broadband will enable more children in our communities to do their homework at home, allow our seniors to age in place, and result in healthcare savings for the chronically ill who can be remotely monitored at home. As an example, Brandy Gentry, the President of the Monroe

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County Chamber of Commerce, stated he sees, on a daily basis, how much businesses depend on the internet for sales, advertisement and even networking. The availability of quality and affordable broadband is becoming a requirement for communities and businesses in Tennessee. He believes that expanded broadband service will be key to economic development in his community.

We urge the Commission to act by the end of this year to allocate additional funding to carry out its original decision to provide A-CAM funding for up to \$200/month per eligible location.

Sincerely,

The Tennessee A-CAM Companies

Concord Telephone Exchange, Inc.
Humphreys County Telephone Company
Tellico Telephone Company
Tennessee Telephone Company

Crockett Telephone Company
Peoples Telephone Company
West Tennessee Telephone Company

cc: Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Jessica Rosenworcel
Commissioner Brendan Carr